



INVESTMENT INDUSTRY ASSOCIATION OF CANADA
ASSOCIATION CANADIENNE DU COMMERCE DES VALEURS MOBILIÈRES

Ian C.W. Russell FCSI
President & Chief Executive Officer

May 31, 2011

The Honourable Gail Shea, P.C., M.P.
Minister of National Revenue
Canada Revenue Agency
555 MacKenzie Avenue
Ottawa, Ontario K1A 0L5

Dear Minister:

Re: Meeting Government Goals – Spending Less on Paperwork Leaves More for Expansion

On behalf of the Investment Industry Association of Canada (IIAC), may I extend congratulations to you on your re-election and appointment to the position of Minister of National Revenue. With your background in provincial government and small business, you are ideally positioned to advance the Canada Revenue Agency's (CRA's) goal of achieving a more cost-effective system by streamlining administration (without sacrificing compliance) to minimize the time, effort and costs that businesses, and in particular small businesses, incur to meet tax requirements. This will contribute to business savings, leading to investment, economic growth and prosperity.

IIAC represents registered securities brokers and dealers on regulatory, tax and other public policy issues to improve the savings/investment process and achieve efficient, liquid, competitive markets that benefit the investing and issuing public. Our 189 member firms range from large full-service companies employing thousands of Canadians across the country to regional institutional boutiques and retail firms, three-quarters of which are small businesses by Statistics Canada's definition. In line with the CRA Commitment to Small Business, we think that administrative provisions should be as reasonable to comply with as possible, especially when legislation and regulations impose costs that are otherwise unnecessary to the businesses' operations. We believe a number of initiatives will lead to more manageable and cost-effective, while equally efficient, processes for taxpayers, tax-reporting intermediaries and the CRA. This will reduce government and business costs and taxpayer frustration, and improve businesses' ability to compete.

Our members recognize and respect the efforts of CRA staff with whom they interact. However, we believe that this longstanding relationship, and inter-relationship with the Ministère du Revenu du Québec, can be made even more effective and are also writing to Finance Minister Flaherty in this regard. We submitted the [attached](#) views – mainly on streamlining tax requirements for individuals, businesses and intermediaries – in response to the Red Tape Reduction Commission and look forward to briefing you when your schedule permits and to working with the CRA and Finance on these issues. We will call shortly to arrange a convenient time to meet.

Yours sincerely,

[original signed by Ian C.W. Russell]